

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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SEOK JAE YANG,

Plaintiffs,

-against-

SUNRISE SENIOR SERVICE LLC d/b/a,
HANMAUM DAYCARE, TAEYOUNG
SONG, JIEUN OH, AURUM TRADING INC.,
JI HOON YOU, KANGSAN CONSULTING LLC,
KANGSAN LEE, L & K OFFICE INC.,
JIN YOUNG KANG a/k/a JINYOUNG KANG a/k/a
JIN Y. KANG, and DOES 1 through 50, inclusive,

Defendants.
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Case No.: 1:24-cv-05459-LDH-TAM

AFFIRMATION OF YOUNGHOON
JI IN SUPPORT OF ENTRY OF
CLERK'S CERTIFICATE OF
DEFAULT OF DEFENDANT
KANGSAN LEE

I, Younghoon Ji, Esq., as counsel for Plaintiff SEOK JAE YANG in the above-styled action,
hereby affirm under penalty of perjury as follows:

1. AHNE & JI, LLP represents the Plaintiff, SEOK JAE YANG, in the above-captioned matter.
2. The within action was commenced for compensatory damages, treble damages, punitive damages, reasonable attorneys' fees, costs, expenses, and disbursements, and any other relief that the Court deems just and proper and as authorized by statute pursuant to the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1962(c). *See* 18 U.S.C. § 1964.
3. The within action was commenced on August 5, 2024. *See* ECF Dkt. No.: 1.
4. The Summons and Complaint (ECF Dkt. Nos.: 1, 17) were served upon Defendant KANGSAN LEE ("Defendant Lee") through a person of suitable age and discretion, to wit: Chang Hrun Im, on August 15, 2024. *See* ECF Dkt. No.: 17.

5. Defendant Lee's time to answer or otherwise respond to the Complaint expired on September 5, 2024. *Id.*

6. On August 23, 2024, Plaintiff filed an Amended Complaint. *See* ECF Dkt. No.: 21.

7. On August 26, 2024, the Amended Complaint was served upon Defendant Lee via mail. *See* ECF Dkt. No.: 22.

8. Defendant Lee's time to answer or otherwise respond to the Amended Complaint expired on September 9, 2024. *See* ECF Dkt. No.: 22; *see also* Fed. R. Civ. P. 15(a)(3) (“[u]nless the court orders otherwise, any required response to an amended pleading must be made within the time remaining to respond to the original pleading or within 14 days after service of the amended pleading, whichever is later.”).

9. Defendant Lee is not an infant. *See* ECF Dkt. No.: 17.

10. Defendant Lee is not an individual in the military service. *Id.*

11. Defendant Lee is not an incompetent person. *Id.*

12. To date, no Answer has been interposed on behalf of Defendant Lee.

13. It is apparent that Defendant Lee has no intention of voluntarily submitting to the jurisdiction of this Court.

WHEREFORE, Plaintiff respectfully requests that the Clerk of the Court enter a Certificate of Default with respect to Defendant KANGSAN LEE in the within matter.

Dated: September 26, 2024
New York, New York

AHNE & JI, LLP

/s/ Younghoon Ji
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